

THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

APPEAL FROM FLORENCE COUNTY
CIRCUIT COURT

Thomas A. Russo, Circuit Court Judge

APPELLATE CASE NO. 2018-001144

RECEIVED
SEP 26 2018
SC Court of Appeals

IN THE MATTER OF:
THOMAS G. MOORE (Decedent)

Michael Dennis Moore.....Appellant,

v.

Thomas Paul Moore, Francine Laura Lawhon,
Linda Kaye Moore, Phillip Frederick Moore.....Respondents.

MEMORANDUM IN SUPPORT OF MOTION FOR EXTENSION OF TIME

Norwood DuRant, Jr., Esquire
Law Offices of N. David DuRant
P.O. Box 14722
Surfside Beach, SC 29587
Phone: (843) 650-7800
Fax: (843) 650-8090
Attorney for Respondent

The Appellant respectfully requests this Court for a 30 day extension to file its Initial Brief and Designation of the Matter to be Included on the Record. This motion is made in accordance to South Carolina Appellate Court Rule 240.

This request is made due to the weather conditions that are currently plaguing Horry and Georgetown counties, the county in which the Appellants' attorney's office is located. Earlier this month, there was a mandatory evacuation issued due to Hurricane Florence. Severe flooding is and will be taking place over the next week, which has and will force road closures. Counsel for the Appellant is not certain the postal services will be able to make deliveries in the required time for filing the above documents.

For the above reasons, the Appellant requests this thirty (30) day extension to file his Initial Brief and Designation of the Matter to be Included on the Record. Due to the unexpected nature of this motion, caused by uncontrollable weather conditions, the Appellant would request this court to allow a Stay of the Time limits until an extension is either granted or denied.

Dated at Surfside Beach, South Carolina, this 25 day of September, 2018.

Norwood D. DuRant, Jr., Esquire (SCB# 101723)
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Surfside Beach, South Carolina 29587
Telephone: (843) 650-7800
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ATTORNEY FOR Respondents

By: _____


Norwood D. DuRant, Jr. Esquire

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

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SEP 26 2018

SC Court of Appeals

APPEAL FROM FLORENCE COUNTY
Court of Common Pleas

The Honorable Thomas A. Russo, Circuit Court Judge

APPELLATE CASE NO. 2018-001144

IN THE MATTER OF:
THOMAS G. MOORE (Decedent)
Michael Dennis Moore.....Appellant,

v.

Thomas Paul Moore, Francine Laura Lawhon,
Linda Kaye Moore, Phillip Frederick Moore.....Respondents.

CERTIFICATE OF SERVICE

I certify that I have served a copy of the Motion for Extension of Time and Memorandum from the SC Court of Appeals with a Certificate of Service by depositing a copy in the United States Mail, postage prepaid, on September 25, 2018, addressed to Parties of Record listed below.

Septemeber 25, 2018

s/ 

Norwood DuRant, Jr., Esquire
Law Offices of N. David DuRant
P.O. Box 14722
Surfside Beach, SC 29587
Phone: 843-650-7800
Fax: 843-650-8090
Attorney for Appellant

Other Parties of Record:

C. Pierce Campbell, Esquire
Turner Padgett
P.O. Box 5478
Florence, SC 29502
Attorney for Defendant Thomas Paul Moore

Francine L. Lawhon
2005 Third Loop Rd.
Florence, SC 29501

Linda K. Moore
1454 Golf Terrace Blvd.
Florence, SC 29502

Phillip F. Moore
3401 Chantz Ct.
Florence, SC 29501

LAW OFFICES OF N. DAVID DuRANT AND ASSOCIATES, P.A.
ATTORNEYS AT LAW

N. DAVID DuRANT, SR.
NORWOOD D. DuRANT, JR.

SURFSIDE BEACH, SOUTH CAROLINA OFFICE:
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PROBATE EMAIL: cjudge@lawofficesofdurant.com(Christina)
REAL ESTATE EMAIL: durantre@lawofficesofdurant.com(Stacy)

September 25, 2018

Via UPS Next Day Delivery

The Honorable Jenny Abbott Kitchings
Clerk, South Carolina Court of Appeals
1220 Senate Street
Columbia, SC 29201

RECEIVED
SEP 26 2018
SC Court of Appeals

RE: Michael Dennis Moore v. Thomas Paul Moore, et al.
APPELLATE CASE NO. 2018-001144

Dear Ms. Kitchings:

Please allow this letter serve as the Appellant's written request for a thirty (30) day extension in filing his Initial Brief and Designation of the Matter to be included on the Record. The due date for filing these two items is October 4, 2018, which is 30 days from September 4, 2018, the date in which the transcript was delivered to the Appellant.

The Appellant respectfully requests this extension due to the weather conditions that are currently plaguing Horry and Georgetown counties, the county in which the Appellants' attorney's office is located. Earlier this month, there was a Mandatory evacuation issued due to Hurricane Florence. Severe flooding is and will be taking place over the next week, which have and will force road closures.

Enclosed for filing are an original and six (6) copies of the Appellant's Motion for Extension of Time in the above case. Also enclosed are the following:

1. Motion for an Extension of Time of the Respondents;
2. Memorandum in Support of the Motion;
3. Certificate of Counsel;
4. Certificate of Sevice; and
5. The required filing fee of \$25.00.

Thank you for your assistance in this matter and in the event you require any further documentation, please do not hesitate to contact our office.

✓

In kind regards, I remain

Sincerely yours,

A handwritten signature in black ink, appearing to read "Norwood D. DuRant, Jr.", with a long horizontal flourish extending to the right.

Norwood D. DuRant, Jr.

NDDjr/jlj

Enclosures

cc: C. Pierce Campbell, Esquire, Attorney for Respondent Thomas Paul Moore
Francine L. Lawhon
Linda K. Moore
Phillip F. Moore

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Surfside Beach, SC 29575

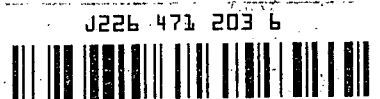
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SC Court of Appeals Clerk
1220 Senate Street
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SC Court of Appeals

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